

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

**RESOLUTION R2-2003-0096**

**To Promote the Collaboration Between Bay Area Clean Water Agencies and the  
Regional Board on Pollution Prevention Program Development and Excellence**

**Whereas**, the California Regional Water Quality Board, San Francisco Bay Region (Board) and the Bay Area Clean Water Agencies (BACWA) are working to prevent and reduce the discharge of pollutants to San Francisco Bay to achieve water quality objectives.

**Whereas**, POLLUTION PREVENTION means any action that causes a net reduction in the use or generation of a hazardous substance or other pollutant that is discharged into water. Pollution prevention does not include actions that merely shift a pollutant in wastewater from one environmental medium to another environmental medium, unless clear environmental benefits of such an approach are identified to the satisfaction of the Board.

**Whereas**, the Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries (SIP) and Section 13263.3 of the California Water Code include provisions for requiring publicly owned treatment works (POTWs) to develop Pollution Prevention Programs.

**Whereas**, a pollution prevention program meeting the requirements of section 13263.3 of the California Water Code contains the following elements:

1. Estimates of all the sources of a pollutant contributing to the pollutant's influent loading.
2. Analysis of methods to prevent the discharge of pollutants from the identified sources.
3. Estimate of load reductions that may be achieved through implementation of the methods identified in item 2.
4. A plan for monitoring the results of the pollution prevention program.
5. A description of the tasks, cost, and time required to investigate and implement various methods.
6. A statement of the POTW's short-term and long-term pollution prevention goals and strategies.
7. Description of the POTW's existing pollution prevention programs.
8. Analysis of any adverse environmental impacts resulting from the proposed pollution prevention program.
9. Cost-benefit analysis to implement the pollution prevention program.

**Whereas,** a pollution prevention program containing the elements pursuant to Water Code Section 13263.3 shall also be considered to fulfill the Pollutant Minimization Program requirements of Section 2.4.5.1 of the SIP.

**Whereas,** Pollution Prevention (P2) efforts can often lead to the prevention or reduction of the discharge of pollutants at their source cost effectively through product substitution, process changes, and best management practices.

**Whereas,** P2 activities can educate the public, raising their awareness regarding water pollution issues and leading to changes in public behavior that may prevent or reduce pollutant discharges.

**Whereas,** POTWs have, and will be required to continue, P2 Programs targeted toward pollutants of concern identified in the discharger's NPDES permit, their approaches varying depending on numerous factors including the quality of their water supply, the types and number of industrial and commercial activities, and other unique service area characteristics.

**Whereas,** differences in service areas and pollutants of concern will result in differences in the P2 activities that will be most effective for individual POTWs.

**Whereas,** written materials designed to help treatment plants develop and augment their Pollution Prevention Programs would be extremely beneficial to POTWs by laying out a range of options and providing guidelines for developing Pollution Prevention Programs with the greatest potential of achieving pollutant discharge reductions.

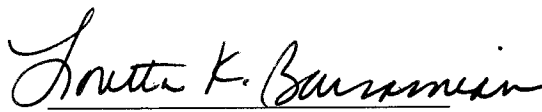
**Whereas,** adaptive management will allow POTWs to respond to changing environmental conditions, regulatory requirements, and service area characteristics that may result in changing priorities with respect to pollutants of concern and changes in the most effective approaches to pollution prevention.

THEREFORE, BE IT RESOLVED that

1. The Board fully supports a joint approach to BACWA's project to develop P2 guidelines (or "P2 Menus"), which individual POTWs can use in developing and augmenting their programs.
2. The Board fully supports the following eleven (11) "Guiding Principles" which will be used to develop P2 Menus that will achieve cost effective P2 Programs throughout the Bay Area:
  - a. Promote activities designed and coordinated on a region-wide or watershed basis to achieve more cost-effective, powerful, and consistent results.
  - b. Promote cross-program and cross-media perspectives/approaches where appropriate.

- c. Encourage Bay Area POTWs to continue in their roles of P2 leadership, creativity and excellence and to recognize their successes.
  - d. Ensure balance between environmental (e.g. receiving water quality) benefit and cost effectiveness.
  - e. Provide flexibility to develop P2 programs that reflect regional and service areas differences and current and historic pollution prevention efforts.
  - f. Achieve Program accountability by defining levels of expectation and assessing program performance. Peer reviews, self-audits and other formats will be considered as tools for these assessments.
  - g. Consider POTW sizes and resources when developing expectations.
  - h. Provide flexibility to balance among source identification studies, pollutant-specific and non-pollutant specific P2 to implement the most cost-effective approach for each pollutant.
  - i. Provide flexibility to measure impacts of a program over an adequate time period to acknowledge short term benefits that result from immediate actions such as product replacement and long term benefits that result from behavior change of the target audience.
  - j. Incorporate adaptive management in a manner that allows POTWs to adjust the frequency, add, modify or sunset program elements as circumstances dictate.
  - k. Preserve voluntary aspects of current program components within structure of regulatory requirements.
3. The Board promotes the continued partnership between BACWA and Board staff on the Steering Committee to develop Pollution Prevention Menus. The goals of the Steering Committee are to develop P2 menus that are consistent with the Board's pollution prevention related policies (Basin Plan, State Implementation Policy, TMDLs, Water Quality Attainment Strategies, etc), and will complement pollution prevention efforts by other organizations.

I, Loretta K. Barsamian, Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of a Resolution adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on October 15, 2003.

  
LORETTA K. BARSAMIAN  
Executive Officer